

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

OCT 07 2015

UNITED STATES OF AMERICA

v.

JASON MCLAUGHLIN

§  
§  
§  
§  
§

NO. 9:15CR 18

JUDGE Schneider/Hawthorn

BY  
DEPUTY \_\_\_\_\_

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. § 373

(Solicitation to Commit a Crime of Violence)

From on or about August 28, 2015 until on or about September 26, 2015, in the Eastern District of Texas and elsewhere, the defendant, **Jason McLaughlin**, with the intent that S.K. engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did intentionally solicit, command, induce and endeavor to persuade S.K. to engage in such conduct, that is to kidnap C.C., in violation of Title 18, United States Code, Section 1201,

All in violation of Title 18, United States Code Section 373.

**Count Two**

Violation: 18 U.S.C. § 922(d) (Transfer of a  
Firearm to a Prohibited Person)

On or about September 23, 2015, in the Eastern District of Texas, the defendant,  
**Jason McLaughlin**, knowingly loaned firearms to S.K., to wit:

<b>Make/Model</b>	<b>Caliber</b>	<b>Serial Number</b>
Remington Nylon 66	.22 caliber rifle	A2131982
Remington Model 1100	12-gauge shotgun	N271318V
Davis Model DM-22cal	.22 caliber handgun	459905

knowing and having reasonable cause to believe that S.K. had been convicted of a crime  
punishable by imprisonment for a term exceeding one year,

All in violation of Title 18, United States Code, Section 922(d) and 924(a)(2).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**  
**Criminal Forfeiture Pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 3665 and 28**  
**U.S.C. § 2461(c)**

As the result of commit in violation of 18 U.S.C. 922(d) in Count Two of this  
indictment, defendant **Jason McLaughlin**, shall forfeit to the United States pursuant to  
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any property constituting, or derived from,  
proceeds obtained directly, or indirectly, as a result of the said violation, and any property  
used, or intended to be used in any manner or part, to commit or to facilitate the  
commission of the said violation, including but not limited to the following:

**United States Currency**

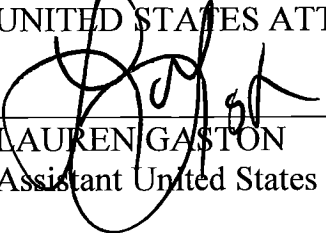
- (a) United States Currency in the amount of \$200.00.

**Personal Property**

- (a) One (1) Remington Nylon 66, .22 caliber rifle, bearing serial number A2131982;
- (b) One (1) Remington Model 1100 12 gauge shotgun, bearing serial number N271318V;
- (c) One (1) David Industries Chino, CA Model DM-22 caliber, 22 magazine, bearing serial number 459905;
- (d) Five (5) rounds of Winchester 12-gauge shotgun shells;
- (e) One (1) box of Winchester High Velocity Turkey Loads, 12-gauge, with seven rounds;
- (f) One (1) box of Winchester PDX112 Defender 12-gauge, with 8 rounds
- (g) One (1) set of brass knuckles;

By virtue of the commission of the offense alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d), 18 U.S.C. § 3665, and 28 U.S.C. § 2461.

JOHN M. BALES  
UNITED STATES ATTORNEY

  
LAUREN GASTON  
Assistant United States Attorney

A TRUE BILL

  
\_\_\_\_\_

GRAND JURY FOREPERSON

Date

10/7/2015  
\_\_\_\_\_

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§ JUDGE \_\_\_\_\_

§

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**NOTICE OF PENALTY**

**Count One**

Violation: 18 U.S.C. § 373 (Solicitation to Commit a Crime of Violence)

Penalty: Imprisonment of not more than one-half the maximum term or fined not more than one-half of the maximum fine prescribed for the punishment of the crime solicited, or both; or if the crime solicited is punishable by life imprisonment or death, shall be imprisoned for not more than twenty years.

18 U.S.C. § 1201 (Kidnapping)

Imprisonment for any term of years or for Life and, if the death of any person results, then death or imprisonment for Life; a fine of \$250,000 (or twice the pecuniary gain to the defendant or loss to the victim), or both, and supervised release of not more than 5 years.

Special Assessment: \$100.00.

**Count Two**

Violation: 18 U.S.C. § 922(d) and 924(a)(2)  
(Transfer of a Firearm to a Prohibited Person)

Penalty: Imprisonment of not more than ten (10) years, a fine not to exceed \$250,000 or twice the pecuniary gain to the defendant or loss to the victim, or both imprisonment and a fine; and a term of supervised release of not more than three (3) years.

Special Assessment: \$100.00.